

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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EPIC SYSTEMS CORPORATION, a  
Wisconsin Corporation,

Plaintiff,

Case No. 14-CV-748

v.

TATA CONSULTANCY SERVICES  
LIMITED, an Indian Corporation; and TATA  
AMERICA INTERNATIONAL  
CORPORATION (dba TCS AMERICA), a  
New York Corporation,

Defendants.

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**PLAINTIFF'S NOTICE OF MOTION AND EMERGENCY MOTION FOR A  
PROTECTIVE ORDER RE TCS'S COUNTERCLAIM DISCOVERY**

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Plaintiff Epic Systems Corporation ("Epic") moves this Court for a protective order on an expedited basis so that Epic will not be required to respond to the counterclaim discovery served by the defendants until after the April 2016 trial on Epic's claims against TCS. The basis for this motion is more fully set forth in the accompanying memorandum.

Dated: December 31, 2015

/s/ Rick Richmond

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